

Exhibit 3

In the Matter Of:

Hammons vs University of Maryland Medical System

20-cv-02088-DKC

WILLIAM C. GRESKOVICH

May 20, 2022

30(b)(6)



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WILLIAM C. GRESKOVICH 30(b)(6)
Hammons vs University of Maryland Medical System

May 20, 2022

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND

3 JESSE HAMMONS :
4 Plaintiff, :
5 :
6 v. : Case No:
7 : 20-cv-02088-DKC
8 UNIVERSITY OF MARYLAND :
9 MEDICAL SYSTEM :
10 CORPORATION; UMSJ HEALTH :
11 SYSTEM, LLC; and :
12 UNIVERSITY OF MARYLAND :
13 ST. JOSEPH MEDICAL :
14 CENTER, LLC, :
15 :
16 Defendants. :
17

18 VIDEOTAPED REMOTE DEPOSITION OF
19 WILLIAM C. GRESKOVICH
20 30(b)(6)

21 Friday, May 20, 2022
22 1:08 p.m., EST

23 Reisterstown, Maryland

24 Megan Sczygelski, Videographer
25 Terry L. Bradley, Court Reporter

WILLIAM C. GRESKOVICH 30(b)(6)
Hammons vs University of Maryland Medical System

May 20, 2022

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1 APPEARANCES OF COUNSEL

2

3 For the Plaintiff:

4 PATERSON BELKNAP WEBB & TYLER, LLP
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7

8 For the Defendants:

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1 INDEX OF EXAMINATION

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EXAMINATION	PAGE
By Mr. Hermann	5

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1 P R O C E E D I N G S  
2

3 THE VIDEOGRAPHER: Good afternoon.

4 I have now started the recording, and we are  
5 now on the record. The time is 1:08 p.m.,  
6 Eastern Time on Friday, May 20th, 2022. This  
7 begins the videoconference deposition of  
8 William Greskovich, taken in the matter of  
9 Jesse Hammons versus University of Maryland  
10 Medical System Corporation, et al., filed in  
11 the U.S. District Court of Maryland, Case No.  
12 20 CV 02088.13 My name is Megan Sczygelski. I'm  
14 your Remote Videographer today. The Court  
15 Reporter is Terry Bradley. We are representing  
16 Esquire Deposition Solutions.17 Will everyone present please  
18 identify themselves and state who you  
19 represent, after which the Court Reporter will  
20 swear the witness.21 MR. HERMANN: Jon Hermann  
22 representing the plaintiff, Jesse Hammons.

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1 MR. WERNER: Paul Werner, Sheppard  
2 Mullin, representing the defendants.

8 WILLIAM C. GRESKOVICH,  
9 was duly sworn, and testified as follows:

12 BY MR. HERMANN:

13 Q. Would you state your name for the  
14 record, please.

15 A. William Charles Greskovich.

16 Q. Hi Mr. Greskovich. My name is Jon  
17 Hermann. I represent the plaintiff, Jesse  
18 Hammons, in this lawsuit against the University  
19 of Maryland Medical System Corporation.

20 (Discussion with the Court  
21 Reporter.)

22 | THE VIDEOGRAPHER: We are going off

1                   This document I'm sharing with you  
2 is Bates stamped UMMS 832. It goes from 832 to  
3 1004. And the first page reads asset purchase  
4 agreement at the top. And I will share my  
5 screen as well.

6                   A.     So the chat is not working for me to  
7 view it. So you may have to go to share  
8 screen.

9                   MR. WERNER: I can't get this to  
10 work for me either.

11                  THE WITNESS: I will say this is  
12 very small on the screen.

13                  MR. HERMANN: Understood.

14                  Mr. Werner, would it make sense for  
15 me to e-mail the file to you and to Mr.  
16 Greskovich?

17                  MR. WERNER: Can you --

18                  Yeah, well, can I just --

19                  Can you make what's on the screen  
20 bigger? I think --

21                  MR. HERMANN: Of course. Sure.

22                  MR. WERNER: Yeah. I think maybe if

1 you could just --

2 You know, maybe this could work.

3 Put the documents on the screen might be the  
4 easiest thing to do if you can just increase  
5 the font size.

6 MR. HERMANN: Unfortunately I can't  
7 see what you see, so just --

8 If you can't see something, just one  
9 of you please speak up. We are on Page 1.

10 THE WITNESS: Yes.

11 MR. HERMANN: Can you see that all  
12 right?

13 THE WITNESS: Yes.

14 BY MR. HERMANN:

15 Q. And was this the agreement that you  
16 reviewed in preparation of your testimony?

17 A. That looks like the agreement I  
18 reviewed.

19 Q. I'm going to go to Page 7 of the PDF  
20 Bates stamped 838.

21 Zooming out slightly. Can you see  
22 the font on the screen?

1 A. Yes.

2 Q. We see here that the agreement lists  
3 UMSJ as the buyer. Do you see that?

4 A. I'm looking for the exact --

5 I see UMSJHS. Can you put a cursor  
6 on -- -

7 Can you move the hand there?

8 Q. Sure.

9 A. It would be helpful. If you move  
10 that hand where you want me to look, that will  
11 make it go better.

12 Q. Yep. You see here where the hand is  
13 now?

14 A. Yep. I see that.

15 Q. And that UMSJ is a buyer --

16 A. Yep.

17 Q. -- as defined in this agreement?

18 Did UMMS create UMSJ for the purpose  
19 of acquiring and operating St. Joseph?

20 A. I don't know that. I didn't --  
21 I'm not a lawyer.

22 Q. Do you know why UMMS created UMSJ?

1 A. No.

2 Q. And do you know when UMMS created  
3 UMSJ?

4 A. No.

5 Q. Are you familiar with the entity  
6 known as UMSJ?

7 A. No.

8 Q. Have you heard of UMSJ before  
9 preparing for this testimony?

10 A. No.

11 Q. So you're not aware whether UMSJ is  
12 the owner of St. Joseph?

13 A. No.

14 Q. Earlier we talked about how the sale  
15 of St. Joseph, it was your understanding that  
16 it required the approval of the Catholic  
17 Church. Is that right?

18 A. That's my understanding.

19 Q. And specifically the Archdiocese of  
20 Baltimore?

21 A. That's the path I understand that it  
22 goes through. Yes.

1 Q. And I'm going to go to Page 71 of  
2 the PDF, Section 11.6.

3 Can you read that here?

4 A. Yes.

5 Q. And does this reflect your  
6 understanding that the Catholic Church must  
7 have approved the sale of St. Joseph before  
8 UMMS could consummate the purchase?

9 A. Yes.

10 Q. And similarly, as part of the  
11 acquisition UMMS committed to continuing to  
12 operate St. Joseph in a manner consistent with  
13 the Catholic values and principles. Is that  
14 right?

15 A. That's my understanding.

16 Q. And if we go to Section 12.17,  
17 that's Bates stamped 832, it's Page 85 of the  
18 PDF. Do you see here Section 12.17?

19 A. Yes.

20 Q. And does this memorialize that  
21 condition?

22 MR. WERNER: Object to the form.

1                   THE WITNESS: I couldn't comment  
2 whether it does that or not, but it sure seems  
3 to intend to do that.

4 BY MR. HERMANN:

5                   Q. By your understanding does this  
6 reflect UMMS's commitment to continuing to  
7 operate St. Joseph in a manner consistent with  
8 Catholic values and principles?

9                   MR. WERNER: Object to the form.

10                  THE WITNESS: Yes.

11 BY MR. HERMANN:

12                  Q. And according to this section -- I'm  
13 going to scroll down just a little bit -- UMMS  
14 would establish and maintain certain  
15 fundamentals to hold St. Joseph accountable for  
16 its Catholic Identity. Is that right?

17                  A. Can you put that cursor where you  
18 want me to read.

19                  Q. First paragraph here.

20                  A. Okay.

21                  MR. WERNER: Object to the form.

22                  THE WITNESS: Yes.

1 BY MR. HERMANN:

2 Q. And one of those fundamentals that  
3 UMMS agreed to was to establish and maintain  
4 the ERD's and that they would be  
5 operationalized at St. Joseph. Is that right?

6 MR. WERNER: Object to the form.

7 MR. HERMANN: And I'm going to move  
8 down to show you where I'm reading.

9 THE WITNESS: Can you restate the  
10 question though.

11 BY MR. HERMANN:

12 Q. Sure. Sure. Just above we looked  
13 at a section that spelled out certain  
14 fundamentals that would be established to --  
15 -- with respect to St. Joseph's  
16 Catholic Identity.

17 MR. WERNER: Object to the form.

18 BY MR. HERMANN:

19 Q. Here in Section 12.17(b) we see that  
20 UMMS committed to continuing to operate in a  
21 manner consistent with its Catholic values by  
22 ensuring that the ERD's are operationalized.

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1 Do you see that in this paragraph?

2           A.        Yeah.   The confusion I have is not  
3 with the paragraph.   I agree that they agreed  
4 to continue with that that was in place.   The  
5 end of your sentence, establishing or  
6 operationalizing, I'm not sure I can answer  
7 that one.   I'm not sure what that part means.

8 Q. You don't have an understanding as  
9 to what operationalized means with respect to  
10 this agreement?

11           A.       I do, but I read that as if it was  
12 operational and in place by the hospital, we  
13 agreed to retain it as you said in the first  
14 part of the sentence.

15 Question. Sorry.

16 Q. Would it be fair to say that UMMS  
17 agreed to assume direct responsibility for  
18 ensuring St. Joseph abides by the ERD's?

19 MR. WERNER: Object to form.

20 THE WITNESS: Yeah. I don't --

21 I don't think I have the background  
22 to answer that question. I think that's --

1 BY MR. HERMANN:

2 Q. Did St. Joseph --

3 I'm sorry. Go ahead.

4 A. Yeah. I think that's outside. It  
5 gets --

6 -- feels legal to me versus  
7 operational.

8 Q. In this first sentence we see here  
9 that UMMS and UMSJ shall continue to ensure  
10 compliance with the ERD's.

11 Do you see that?

12 A. Uh-huh.

13 Q. And you don't have an understanding  
14 as to whether UMMS, as a condition to sale,  
15 assumed the responsibility to ensure that the  
16 ERD's are operationalized at St. Joseph?

17 MR. WERNER: Object to the form.

18 THE WITNESS: Yeah, I would --

19 From my operational standpoint we --

20 -- the Catholic Identity is managed  
21 locally by the local leadership team and the  
22 CEO and senior executives on the Board at the

1 hospital level.

2 BY MR. HERMANN:

3 Q. But according to this agreement  
4 here, it was UMMS's assurance that it would  
5 ensure that St. Joseph continued to abide by  
6 the ERD's. Is that right?

7 MR. WERNER: Object to the form.

8 THE WITNESS: Yeah. I couldn't  
9 comment on how ensure is used in that context.

10 BY MR. HERMANN:

11 Q. And again, we see here UMMS and UMSJ  
12 and UMSJHS -- which I'll represent is the same  
13 entity as UMSJ -- and again, you testified that  
14 you are not familiar with the entity UMSJ?

15 MR. WERNER: Object to the form.

16 THE WITNESS: Correct. Prior to  
17 reading this document I had no knowledge of  
18 that.

19 BY MR. HERMANN:

20 Q. Prior to reading this document was  
21 it your knowledge that UMMS had direct  
22 authority over St. Joseph?

1 MR. WERNER: Object to the form.

2 THE WITNESS: Again, can you be more  
3 clear in what sense --

4 Are we talking about the Catholic  
5 Initiative?

6 BY MR. HERMANN:

7 Q. I'm talking just general  
8 organizational structure. Is St. Joseph a  
9 subsidiary of UMMS?

10 A. Yes. St. Joe's is a subsidiary of  
11 UMMS. Correct.

12 Q. I'm going to now go to PDF Page 84,  
13 Section 12.16, which is entitled Governance.

14 Do you see that on my screen?

15 A. I do.

16 Q. And do you see here that UMMS has  
17 the right to directly appoint two voting  
18 members of the UMSJ Board?

19 A. I do.

20 Q. Are you aware that UMMS currently  
21 exercises its right?

22 MR. WERNER: Object to the form.

1                   THE WITNESS: I --

2                   I would imagine we do. I couldn't  
3 confirm that we've got two members on it right  
4 now.

5 BY MR. HERMANN:

6 Q.       And to your understanding does  
7 UMMS's appointment power extend to both the  
8 Board of UMSJ and St. Joseph?

9 A.       Um, I don't know that answer to that  
10 question.

11 Q.       Prior to preparing for this  
12 deposition were you aware that UMMS had the  
13 power to appoint members to the Board of either  
14 UMSJ or St. Joseph?

15 A.       I would have assumed there were, but  
16 I did not honestly ever think about it.

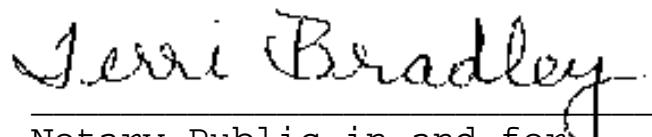
17 Q.       And just maybe for clarity, why  
18 don't I go to Section --

19                   Excuse me.

20                   -- Subsection C, 12.16 Subsection C.  
21 And we see here that UMMS and UMSJ shall ensure  
22 that the members of the UMSJ Board constitute

## 1 CERTIFICATE OF NOTARY PUBLIC

2 I, Terry L. Bradley, the officer before  
3 whom the foregoing deposition was taken, do  
4 hereby certify that the witness whose testimony  
5 appears in the foregoing deposition was duly  
6 sworn by me; that the testimony of said witness  
7 was taken by me in shorthand and thereafter  
8 reduced to computerized transcription under my  
9 direction; that said deposition is a true  
10 record of the testimony given by said witness;  
11 that I am neither counsel for, related to, nor  
12 employed by any of the parties to the action in  
13 which this deposition was taken; and further,  
14 that I am not a relative or employee of any  
15 attorney or counsel employed by the parties  
16 hereto, nor financially or otherwise interested  
17 in the outcome of the action.

18   
19 \_\_\_\_\_  
20

21 Notary Public in and for  
22 the State of Maryland

23 My Commission expires: November 15, 2023

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1 DEPOSITION ERRATA SHEET

2 Our Assignment No. J8261281

3 Case Caption:

4 Jesse Hammons

5 vs.

6 University of Maryland Medical System

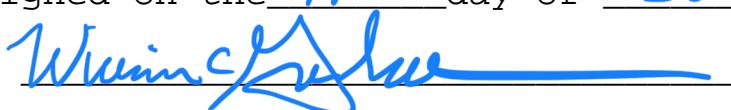
7 Corporation, et al

8

9 DECLARATION UNDER PENALTY OF PERJURY

10 I declare under penalty of perjury that I  
11 have read the entire transcript of my  
12 Deposition taken in the captioned matter or the  
13 same has been read to me, and the same is true  
14 and accurate, save and except for changes  
15 and/or corrections, if any, as indicated by me  
16 on the DEPOSITION ERRATA SHEET hereof, with the  
17 understanding that I offer these changes as if  
18 still under oath.

19  
20 Signed on the 17<sup>th</sup> day of June, 2022.

21 

22 William C. Greskovich

## 1 DEPOSITION ERRATA SHEET

2 Page No. 19 Line No. 4 Change to: 2 years3 2 years is the correct number

4 Reason for change: \_\_\_\_\_

5 Page No. 86 Line No. 8 Change to: \_\_\_\_\_6 Process7 Reason for change: Process improvement was the statement8 Page No. 90 Line No. 3 Change to: UMM.EDU

9 \_\_\_\_\_

10 Reason for change: Correction

11 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

12 \_\_\_\_\_

13 Reason for change: \_\_\_\_\_

14 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

15 \_\_\_\_\_

16 Reason for change: \_\_\_\_\_

17 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

18 \_\_\_\_\_

19 Reason for change: \_\_\_\_\_

20 SIGNATURE William C. Greskovich DATE: 6/17/22  
21

22 William C. Greskovich

## 1 DEPOSITION ERRATA SHEET

2 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

3 \_\_\_\_\_

4 Reason for change: \_\_\_\_\_

5 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

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7 Reason for change: \_\_\_\_\_

8 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

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10 Reason for change: \_\_\_\_\_

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13 Reason for change: \_\_\_\_\_

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16 Reason for change: \_\_\_\_\_

17 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

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19 Reason for change: \_\_\_\_\_

20 SIGNATURE: William C. Greskovich DATE 6/17/22

22 William C. Greskovich